STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



JOHN ELIAS BALDACCI GOVERNOR

DAVID P. LITTELL COMMISSIONER

Carrier Chipping, Inc. **Somerset County** Skowhegan, Maine A-813-71-D-M (SM)

Departmental Findings of Fact and Order Air Emission License Amendment #1

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., § 344 and § 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

- 1. Carrier Chipping, Inc. (Carrier) was issued Air Emission License A-813-71-C-N on May 30, 2008, permitting the operation of emission sources associated with their pulpwood chipping facility.
- 2. The equipment addressed in this license is located at 36 Carrier Lane in Skowhegan, Maine.
- 3. Carrier has requested a minor revision to their license in order to redefine the term "emergency" as it pertains to the operation of the facility's emergency diesel generator.

B. Revision Description

Carrier's current air emission license specifically prohibits them from running their emergency engine, for purposes other than for regular maintenance, until off-site power becomes unavailable. That is the point at which the term "emergency" has traditionally been applied.

Due to the potential for tight electricity supplies, ISO New England has taken several precautionary steps to ensure the reliability of the region-wide bulk power system. One of those steps is the implementation of the Demand Response Program. This program offers financial incentives to customers, such as Carrier, to reduce electricity demand during peak periods. This program can significantly improve the reliability of the region-wide bulk power system and hopefully allow ISO New England to avoid drastic measures, such as brown outs.

In order for Carrier to participate in the Demand Response Program, they need to start their emergency engine and run it prior to, or in lieu of, loss of off-site power. Carrier will only operate in this manner if there is a documented request Carrier Chipping, Inc. Somerset County Skowhegan, Maine A-813-71-D-M

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from ISO New England under their emergency OP-4 procedures. ISO New England's OP-4 is a procedure which establishes criteria and guidelines for actions during capacity deficiencies. OP-4 is implemented when there is determined to be a serious threat to the integrity of the bulk power system. Therefore, the Department has agreed to redefine the term "emergency" as it applies to Carrier's emergency engine to include ISO New England OP-4 emergencies.

Therefore "Emergency Generator", as it applies to Carrier, is defined as any stationary internal combustion engine whose operation is limited to emergency situations, required testing and maintenance, and ISO New England OP-4 emergencies. Examples include stationary engines used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary engines used to pump water in the case of fire or flood.

Additionally, Carrier shall only be permitted to operate the emergency engine in response to an OP-4 emergency for a total of no more than 50 hours each calendar year.

C. Application Classification

This amendment will not increase permitted emissions of any pollutant. Therefore, this modification is determined to be a minor revision and has been processed as such.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-813-71-D-M subject to the conditions found in Air Emission License A-813-71-C-N and in the following conditions.

<u>Severability</u>. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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The following are new Conditions:

(20) **OP-4** Emergencies

A. Carrier shall only operate the emergency engine for periods of maintenance and readiness testing, emergencies when the Chipper Drive is unavailable, and ISO New England OP-4 emergencies. [06-096 CMR 115, BPT]

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- B. Carrier shall keep records for OP-4 emergencies which include the date, which generators were operated, start time and stop time for each generator, and documentation that Carrier was contacted by ISO New England and asked to reduce consumption as part of an OP-4 event. [06-096 CMR 115, BPT]
- C. Carrier shall not operate the emergency engine for more than 50 hours each per calendar year in response to an OP-4 emergency. [06-096 CMR 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS	20H	DAY OF November	2009.
DEPARTMENT OF ENVIRONMENTAL PROTECT	ION		
BY: Samues f. Brooks for T DAVID P. LITTELL, COMMISSIONER			

The term of this amendment shall be concurrent with the term of Air Emission License A-813-71-C-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/14/09
Date of application acceptance: 9/16/09

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Ross, Bureau of Air Quality.

